ILD 005105481

JACOBS

TES IV

JACOBS ENGINEERING GROUP INC.
ENVIRONMENTAL SYSTEMS DIVISION

IN ASSOCIATION WITH:
TETRA TECH
METCALF & EDDY
ICAIR LIFE SYSTEMS
KELLOGG CORPORATION
GEO/RESOURCE CONSULTANTS
BATTELLE PACIFIC NORTHWEST LABORATORIES
DEVELOPMENT PLANNING AND RESEARCH ASSOCIATES

ENVIRONMENTAL PROTECTION AGENCY
TECHNICAL ENFORCEMENT SUPPORT AT
HAZARDOUS WASTE SITES

TES IV
CONTRACT NO. 68-01-7351
WORK ASSIGNMENT NO. 505

LAND DISPOSAL RESTRICTION INSPECTIONS

EPA REGION V

AMERICAN NATIONAL CAN
5620 W. 51st STREET
CHICAGO, ILLINOIS 60638

JACOBS ENGINEERING GROUP, INC.
PROJECT NO. 05-B505-00

PREPARED BY:

METCALF & EDDY, INC.
85 W. ALGONQUIN ROAD, SUITE 500
ARLINGTON HEIGHTS, IL 60005

EPA Identification Number: ILD 005105481

Facility Representative: Judith Peters,
Environmental Specialist

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List of Attachments

1.0 Introduction

A Land Disposal Restriction (LDR) inpection was conducted for American National Can, 5620 W. 51st Street, Chicago, Illinois on January 21, 1988. This facility was included in Work Assignment Number 505 issued by the U.S. EPA under the TES IV contract. The inspection was conducted under the authority of section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended.

This investigation was required to assess the level of compliance to the Land Disposal Restrictions promulgated November 8, 1986. These restrictions prohibit the land disposal of F001-F005 waste solvents. The purpose of this investigation was to review only the management practices of those particular waste solvents.

The purpose of this report is to supply the EPA with information which they will use to make a determination of compliance of violation with respect to the LDR. This report, documentation from the facility and site photographs will be utilized for the determination.

2.0 Participants

The inspection was conducted by Margaret Murdock and Carol Meyer, Metcalf & Eddy (TES IV contractors), subcontractors to Jacobs Engineering Group, Inc.

The American National Can representative was Ms. Judy Peters, Environmental Specialist. The inspection was conducted at 8101 W. Higgins Road, Chicago, IL. The facility on west 51st Street was closed in October, 1987.

3.0 Inspection Procedures

Upon arrival at the facility, the TES IV contractors met with Ms. Peters. The purpose and format of the LDR inspection was explained to Ms. Peters. It was also explained that the facility was entitled to declare certain information as Confidential Business Information (CBI). Ms. Peters declined to declare CBI.

During the initial in-briefing, Ms. Peters gave a brief description of the facility. The inspection consisted of a review of relevant documents. At the end of the inspection, the TES IV contractors reviewed their observations with Ms. Peters.

4.0 Facility Description

The American National Can facility at 5620 W. 51st Street in Chicago, IL was a three piece can manufacturing plant. The cans were primarily made for the food industry. Since the merger of American Can and National Can, the operations, at the 51st. plant were moved to the Englewood plant. The 51st Street plant has not manufactured any cans since October, 1987. The last shipments of waste materials were made in early December, 1987. American National Can still rents the facility on W. 51st Street which contains only virgin products that will be shipped to other plants. When these products are removed, the lease will be terminated.

4.1 RCRA Status and F-solvent Waste Activities

This facility had operated under U.S. EPA generator ID number ILD 005105481. Through the manufacture and coating of three piece cans, the facility had generated three waste streams.

The first stream is a sodder waste that contained a great deal of lead and tin. This was sold to a reclaimer.

The second stream was a spent F-solvent waste. The solvent product used throughout the facility for general cleaning purposes was called #3 Blend Solvent. This solvent was one-third MEK, one-third MIBK and one-third toluene. The spent solvent was collected in drums and sent to Avganic Industries in Cottage Grove, Wisconsin for reclaiming. Avganic sold the reclaimed solvent back to American National Can. The facility generated approximately 80 drums/month of the F003/F005 spent solvent.

The last waste stream was a mixture of the sludge at the bottom of the spent solvent drums, waste coatings and waste oil. These wastes were collected in drums and sent to M&M Chemical and Equipment Co. in Gadsen, AL for fuel blending. The facility generated approximately 80 drums/year of the F003/F005 waste flammable liquid.

5.0 Manifests

The following is a description of the handling of F-solvent waste from the point of on-site generation to shipment off-site for recycling/reclamation and fuel blending. The manifests for shipment of F-solvent waste were inspected for the following information; the amount of waste generated, the frequency of off-site shipments for

recycling/reclamation and fuel blending, the proper classification of the F-solvent waste, and the inclusion of the required notifications and/or certifications.

The manifests inspected included those for the shipments of F-solvent waste from on-site to Avganic Industries for recycling/reclamaiton and to M&M Chemical for fuel blending.

For shipments of the F-solvent wastes, the required generator notifications were included with the manifests. The facility had begun to use a standard notification form from M&M Chemical in the last quarter of 1987. However, the only notifications found with the manifests were for the last two waste shipments made in December, 1987. Ms. Peters explained that the facility personnel did not understand that they should maintain a copy of the notification with their records. Ms. Peters stated that the notifications had been used for more than just these two shipments.

A shipment of F-solvent waste for reclamation was sent to Avganic on a monthly basis. The shipments to M&M chemical were less frequent on an as-generated basis. The 90 day storage time limit was not exceeded.

Examples of the manifests and notifications are included in this report as Attachment I. The generator checklist in Attachment II summarizes all F-solvent waste shipments from November, 1986 through December, 1987.

6.0 Visual Inspection

A visual inspection of the facility was not made. The site is no longer operational.

7.0 Findings and Conclusions

The RCRA Land Disposal Restriction Inspection Checklist was completed for those parts applicable to the generation of F-solvent wastes at American National Can on W. 51st Street.

Sections of the checklist that are not applicable are so marked. The checklist is included as Attachment II to this report.

No waste is being generated at this facility since its manufacturing operations ceased in October, 1987. The last wastes were shipped off-site in December, 1987.

Attachment I

Manifests of F-solvent Wastes

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. VLDCL510548 1 | Manifest Document No. 890769 | 2. Page 1 of 1. | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
AMERICAN NATL CAN - ATTN R KRESLAK
5630 W 51ST CHGO, ILL. 60638

4. Generator's Phone (312) 563-4300

A. State Manifest Document Number: MMI-0005905

B. State Generator's ID: 031600569 1

5. Transporter 1 Company Name: SCHNEIDER TANK LINE

6. US EPA ID Number: WID 980 904 742

C. State Transporter's ID: 126

D. Transporter's Phone: 414-733-4720

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
M & M Chemical & Equipment Co., Inc.
Hwy. 11 North (Mailing: P.O. Box 291
Reece City, AL Gadsden, AL 35902)

10. US EPA ID Number: ALD070513767

G. State Facility's ID: ALD070513767

H. Facility's Phone: 205-538-3800

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. X Waste Flam Liq. NOS. UN1993		60	DM	3300	G	F003 F005
b.						
c.						
d.						

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Non Reclaimable.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the ~~best waste management~~ method that is available to me and that I can afford.

Printed/Typed Name: R KRESLAK. | Signature: Robert Kreslak | Month 12 Day 08 Year 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: WILLIAM BOWEN | Signature: William Bowen | Month 12 Day 08 Year 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Month . Day . Year .

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Vicki Leeth | Signature: Vicki Leeth | Month 12 Day 09 Year 87

ORIGINAL - RETURN TO GENERATOR

"EXAMPLE FORM"

GENERATOR NOTIFICATION
TO M & M CHEMICAL CO.,INC.
REGARDING SHIPMENT OF WASTES
RESTRICTED FROM LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by Ohm Natl Corp - 723 to M & M Chemical Co., Inc. in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7(a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to M & M Chemical Co., Inc.:

1. EPA Hazardous Waste Number(s): ILD 005105481 -
2. Corresponding Treatment Standard (see below).
3. Manifest number associated with this shipment: MMI 005905
4. Waste analysis data (attach if different from qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply.

Solvent Constituent	Concentrations (mg/liter) Wastewaters containing spent solvents	All other spent solvent wastes
[illegible]one	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	0.05	0.96
Chlorobenzene	0.15	0.05
Cresols and cresylic acid	2.82	0.75
Cyclohexanone	0.125	0.75
1,2 -Dichlorobenzene	0.65	0.125
Ethyl acetate	0.05	0.75
Ethyl benzene	0.05	0.053
Ethyl ether	0.05	0.75
Isobutanol	5.0	5.0
Methanol	0.25	0.75
Methylene chloride	0.20	0.96
Methylene chloride (from the pharamaceutical industry)	12.7	0.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluromethane	0.05	0.96
Xylene	0.05	0.15

Chapter 144, Wis. Stats.

Bureau
Box 8094
Madison, Wisconsin 5[illegible]

Please print or type. Form designed for use on elite (12-pitch) typewriter. SEE INSTRUCTIONS ON REVERSE SIDE OF COPY 6.

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. [illegible] Manifest Document No. [illegible]

2.

A. State Manifest Document WI 107538

3. Generator's Name and Mailing Address [illegible]

B. State Generator's ID [illegible]

4. Generator's Phone ([illegible])

5. Transporter 1 Company Name [illegible]

6. US EPA ID Number [illegible]

C. State Transporter's ID [illegible]

D. Transporter's Phone [illegible]

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
[illegible]
114 N. [illegible]
[illegible] WI 5[illegible]

10. US EPA ID Number [illegible]

G. State Facility's ID [illegible]

H. Facility's Phone [illegible]

GENERATOR

11. US DOT Description (*Including Proper Shipping Name, Hazard Class, and ID Number*)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. WASTE PAINT RELATED MATLS FLAM LIQ. (MEK, MIBK, TOLUENE) UN 1263	34	DM	3[illegible]	G	[illegible]
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
[illegible] R[illegible]-70

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. Unless I am a small quantity generator who has been exempted by statute or regulation for the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name & Position Title	Signature	Date Month Day Year
[illegible]	[illegible]	[illegible]

TRANSPORTER

17. TRANSPORTER 1 Acknowledgement of Receipt of Materials

Printed/Typed Name & Position Title	Signature	Date Month Day Year
MIKE [illegible] TRUCK DRIVER	Mike [illegible]	[illegible]

18. TRANSPORTER 2 Acknowledgement of Receipt of Materials

Printed/Typed Name & Position Title	Signature	Date Month Day Year

FACILITY

19. Discrepancy Indication Space

20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name & Position Title	Signature	Date Month Day Year
TERRY REYNOLDS	Terry Reynolds	12 [illegible] 87

Emergency 24 Hour Assistance Telephone Number
In Wisconsin (608-266-3232)
Outside Wisconsin (800-424-8802)

COPY 5

Copy Distribution: 1 — BSWM 4 — Facility
2 — Generator 5 — Generator
3 — BSWM 6 — Transporter
BSWM Copies 1 & 3 mail to Wis. DNR at above address.

GENERATOR NOTIFICATION
TO ~~M & M CHEMICAL CO., INC.~~ AVGANIC INDUSTRIES, INC.
REGARDING SHIPMENT OF WASTES
RESTRICTED FROM LAND DISPOSAL
UNDER 40 CFR 268.7(a)(1)

This notification is submitted by AMERICAN NATIONAL CAN 723 to ~~M & M Chemical Co.~~ AVGANIC INDUSTRIES, Inc. in accordance with the Land Disposal Restrictions, Final Rule (effective Nov. 8, 1986) under 40 CFR 268.7(a)(1). According to this final rule, generators of EPA Hazardous Waste Numbers F001 to F005 must provide the following information with each shipment delivered to ~~M & M Chemical Co.~~ AVGANIC INDUSTRIES, Inc.:

1. EPA Hazardous Waste Number(s): IL0 005105481

2. Corresponding Treatment Standard (see below).

3. Manifest number associated with this shipment: WI 107538

4. Waste analysis data (attach if different from qualification analysis).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) which apply.

Solvent Constituent	Concentrations (mg/liter) Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	0.05	0.96
Chlorobenzene	0.15	0.05
Cresols and cresylic acid	2.82	0.75
Cyclohexanone	0.125	0.75
1,2 -Dichlorobenzene	0.65	0.125
Ethyl acetate	0.05	0.75
Ethyl benzene	0.05	0.053
Ethyl ether	0.05	0.75
Isobutanol	5.0	5.0
Methanol	0.25	0.75
Methylene chloride	0.20	0.96
Methylene chloride (from the pharamaceutical industry)	12.7	0.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,1,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluromethane	0.05	0.96
Xylene	0.05	0.15

Attachment II

RCRA Land Disposal Restriction Inspection Checklist

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: American National Can

U.S. EPA I.D. No.: ILD 005105481

Street: 5620 West 51st Street

City: Chicago State: IL Zip Code: 60638

Telephone: 312 399 3329

Operator: SAME

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: AMERICAN NATIONAL CAN

Street: 7101 W. HIGGINS

City: CHICAGO State: IL Zip Code: 60631

Telephone: (312) 399-3162

Inspection Date: 1/11/89 Time: 0900-1000 Weather Conditions: SUNNY 35°F

	Name	Affiliation	Telephone
Inspectors:	CARL MEYER	M+E	228-0900
	MARGARET MURDOCK	M+E	228-0900

Facility Representatives: JUDY PETERS, SENIOR ENVIRONMENTAL SPECIALIST

	RCRA Status	LDR Status: F-Solvent	LDR Status: California List
Generator	✓	✓	NA
Transporter	NA	NA	
Treater			
Storer			
Disposer	✓	✓	✓

INSPECTION SUMMARY

The American National Can Facility at 5620 W 51st Street in Chicago IL 60638 was closed by the company in October 1987. At the time of this inspection the facility no longer contained any waste material. American National Can still leased the facility and will do so until all usable products remaining are shipped to other locations. However, the inspection was conducted at 8101 Higgins Rd with Judy Peters. The Contractor discussed the past waste generation at the facility and reviewed manifests for shipments of the wastes from the facility to Arsenic in Cottage Grove, WI for reclamation and M&M Chemical in Alabama for fuels blending. The manifests were completed properly and the required generator notifications were included with these manifests. The spent solvent was a mixture of 30% MEK, 30% MIBK and 30% Toluene. It was reclaimed at Arsenic. The sludgy bottoms and waste coatings were sent to M&M Chemical for fuels blending. The two wastes were characterized as F003/F005. The last shipments of spent F-solvent waste were made on 12/4/87 and 12/8/87. No more spent solvent remains at the facility.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	**F-Solvent Wastes**					
1.	F001	____	NA	NA	NA	NA
2.	F002	____	____	____	____	____
3.	F003	X	____	____	____	____
4.	F004	____	____	____	____	____
5.	F005	X	____	____	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes NOT Applicable

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

____	____	____	____	____

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   X Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ___ Pharmaceutical wastewater containing spent methylene chloride
   X All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? Not Applicable

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ____ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

X Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

X Yes ____ No

If yes, note how this is adequate: FROM MSDS INFORMATION.

- TCLP

____ Yes ____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

____

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

X Yes ____ No ____ NA

If yes, specify the waste stream: (1) Waste Flammable Liquids NOS in 1993 F003/F005 — (2) Waste Paint Related materials Flammable Lq. in 1993 MEK/MIBK Toluene F005/F003

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes X No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?

IF A NEW SOLVENT product will to be used, the MSDS would be checked for constituent concentrations.

2. California List Wastes NOT APPLICABLE

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ____ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

_____ Yes _____ No _____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

_____ Yes _____ No _____ NA

If yes, note how this is adequate: _____
_____
_____

- Testing

_____ Yes _____ No _____ NA

If yes, list test method used: _____

d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____
_____
_____
_____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

___ Yes X No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

X Yes ___ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

X Yes ___ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	___ Yes	X No
Applicable treatment standards	X Yes	___ No
Manifest number	X Yes	___ No
Waste analysis data, if available	___ Yes	X No Not Available

In this state the notifications are correctly identifying the facility by its ID number

Identify off-site treatment or storage facilities: See (1) and (2)

ALD 070513767
(1) M & M Chemical & Equipment Co
Hwy 11 North
P.O. Box 291
Reece City, AL
Gadsen, AL
35902

(2) Organic Industries
119 N. Main St.
Cottage Grove, WI
53527
WID 000808824

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

___ Yes X No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

___ Yes ___ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

_____

_____

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No X NA

D. <u>Treatment Using RCRA 264/265 Exempt Units or Processes</u> (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.) NOT Applicable

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

____ Yes ____ No

If yes, list types of waste treatment units and processes:

_____

_____

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
AUGANIC INDUSTRIES WID 0000 8[illegible]824		F005/F005 Waste Paint Related Materials - Flammable Liquid (MEK - MIBK Toluene) UN1993	80 DM 4400 gal	[illegible]-2-86
			80 DM 4400 gal	[illegible]-10-86
			80 DM 4400 gal	1-14-87
			80 DM 4400 gal	2-16-87
			84 DM, 4620 gal	3-16-87
			84 DM, 4620 gal	4-15-87
			68 DM, 3740 gal	5-8-87
			84 DM, 4620 gal	6-10-87
			84 DM, 4620 gal	7-8-87
				7-31-87
			80 DM, 4400 gal	9-1-87
			80 DM, 4400 gal	Revised 11-03-87
			84 DM, 4620 gal	9-29-87
			56 DM, 3080 gal	12-4-87 (Notification)

M & M Chemical & Equipment Co. HWY 11 North P.O. Box 291 Reece City, AL GADSEN AL 35902	Fuel Blender	F003/F005 Waste Flam Lq NOS 1993	60 DRUMS	12/9/87 Notification
			29	9/18/87
			21	4/14/87
			18	12/3/86
			16	8/7/86